

REMARKS

Claims 1, 4, 7, 10, 13-15, 20-21 and 24-29 were examined by the Office, and in the Office Action of May 26, 2009 all claims are rejected. With this response no claims are amended. Applicant respectfully requests reconsideration and withdrawal of the rejections in view of the following discussion.

Claim Rejections Under § 101

In section 5, on page 2 of the Office Action, claims 4, 10 and 13-14 are rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The Office asserts that claims 4, 10 and 13 may be interpreted and implemented as software alone when read in light of the specification. However, applicant respectfully submits that claims 4 and 13 are “means-plus-function” claims corresponding to independent claims 15 and 20 respectively. The Office acknowledges that claim 20 is statutory since claim 20 sufficiently recites hardware elements. Therefore, if the limitations of claim 13 correspond to the limitations of claim 20 in means-plus-function format, then the means limitations of claim 13 are supported by the hardware elements identified in claim 20. The same comments apply with respect to claim 4, which means-plus-function limitations correspond to claim 15.

Furthermore, claim 10 specifically recites a first authentication server and a second authentication server. These servers are shown for example in Figure 2 as items 23a and 23b. Therefore, applicant respectfully submits that the authentication servers are hardware components, and claim 10 is statutory.

Claim Rejections Under § 103

In section 8, on page 4 of the Office Action, claims 1, 4, 7, 10, 13, 15, 20 and 24-29 are rejected under 35 U.S.C. § 103(a) as unpatentable over O’Neill (U.S. Appl. Publ. No. 2003/0176188) in view of Bhagwat et al. (U.S. Patent No. 6,651,105). Applicant respectfully submits that claim 1 is not disclosed or suggested by the cited references, because the cited references fail to disclose or suggest all of the limitations recited in claim 1. The cited references, alone or in combination, at least fail to disclose or suggest transmitting a

reauthentication identity to a terminal in response to a request for full authentication, as recited in claim 1.

The Office acknowledges on page 4 of the Office Action, that O'Neill does not disclose the transmission to the terminal of the reauthentication identity is in response to a request for full authentication of the terminal, and relies upon Bhagwat for this teaching. However, applicant respectfully submits that O'Neill also does not disclose or suggest transmitting to a terminal a reuathentication identity. Instead, O'Neill only discloses that the mobile node may send an identity to the network, since message 550 is directed towards the Remote Home Agent 112 of the MN 202 in the home domain 1102, but it is first sent to the access router 128 as message 550a and it is then sent to the remote home agent 112 as message 550b. See O'Neill paragraph [0053]. The message 550 includes a network access identifier having a user part and a realm part, however the message 550 is sent towards the Remote Home Agent 112, and therefore is not transmitted to the terminal, as recited in claim 1.

Furthermore, Bhagwat fails to disclose or suggest transmitting to the terminal a reauthentication identity uniquely identifying an authentication server in response to the request for full authentication, as recited in claim 1. Bhagway only discloses a "cookie," but the cookie does not uniquely identify an authentication server or a BS in Bhagwat. Instead, Bhagwat only discloses that AP2 817 uses the username to find out the BS 818, and initiates a tunnel establishment procedure towards the BS 818. The cookie does not correspond to the reauthentication identity in claim 1, because the cookie does not uniquely identify an authentication server, as required by the reauthentication identity of claim 1. Therefore, for at least the reasons discussed above, claim 1 is not disclosed or suggested by the cited references.

Independent claims 4, 10, 13, 15, 20 and 27 are amended to include limitation similar to those recited in claim 1. Therefore, for at least the reasons discussed above with respect to claim 1, these independent claims are not disclosed or suggested by O'Neill.

The claims rejected above and depending from the above mentioned independent claims, are not disclosed or suggested by O'Neill at least in view of their dependencies.

In section 16, on page 8 of the Office Action, claims 14 and 21 are rejected under 35 U.S.C. § 103(a) as unpatentable over O'Neill and Bhagwat in view of Barriga-Caceres et al.

(U.S. Appl. Publ. No. 2003/0163733). Claims 14 and 21 ultimately depend from an independent claim, and Barriga-Caceres fails to make up for the deficiencies in the teachings of O'Neill and Bhagwat identified above. Therefore, claims 14 and 21 are not disclosed or suggested by the cited references at least in view of their dependencies.

Conclusion

For at least the foregoing reasons applicant respectfully submits that the present application is in condition for allowance, and such action is earnestly solicited. The Commissioner is hereby authorized to charge to Deposit Account No. 23-0442 any fee deficiency required to submit this paper.

Respectfully submitted,

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